UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

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IN RE SONUS NETWORKS, INC.)	Civ. Action No. 04-10294 DPW
SECURITIES LITIGATION)	
)	

DEFENDANT SONUS NETWORKS, INC.'S MOTION FOR PROTECTIVE ORDER TO PRECLUDE DISCOVERY ON DISMISSED AND UNPLEADED CLAIMS AND ALLEGATIONS AND TO LIMIT DISCOVERY TO A REASONABLE TIME PERIOD

Pursuant to Federal Rule of Civil Procedure 26(c), defendant Sonus Networks, Inc. ("Sonus") hereby moves the Court for a protective order precluding Lead Plaintiff from serving discovery on Sonus or other parties or non-party witnesses relating to claims or allegations dismissed by the Court or not pleaded by Lead Plaintiff, and limiting discovery to a reasonable time frame.

In support of this motion, Sonus states:

- 1. In an attempt to bolster its operative complaint, Lead Plaintiff repeatedly has sought discovery from defendants and third parties relating to claims and allegations that were dismissed or are otherwise outside the realm of the few allegations sustained by the Court in its May 10, 2006 Order. Such discovery is impermissible under the Private Securities Litigation Reform Act.
- 2. Lead Plaintiff also has commanded the production of documents from an overbroad and open-ended time period of January 1, 2001 through the present. As documents dated after September 30, 2004 are largely irrelevant to this matter, the Court should limit discovery to the reasonable time frame of January 1, 2001 through September 30, 2004, which is

a full year and two months before the beginning of, and six months after the close of, the purported Class Period.

WHEREFORE, for the foregoing reasons, and those stated in the accompanying memorandum of law, defendant Sonus Networks, Inc. respectfully requests that the Court:

- A. Enter a protective order:
 - 1. Precluding Lead Plaintiff from pursuing further discovery from any defendant or third party relating to the allegations dismissed by the Court, or otherwise outside the limited claims and allegations affirmed by the Court in its May 10, 2006 Order, and
 - 2. Limiting the time period for discovery to January 1, 2001 through September 30, 2004;
- В. Award attorney's fees and costs to defendant Sonus; and
- C. Grant such further relief that the Court deems fair and just.

REQUEST FOR ORAL ARGUMENT

Defendant Sonus Networks, Inc. believes that oral argument may assist the Court in deciding the issues presented by this motion, and accordingly requests a hearing pursuant to Local Rule 7.1(D).

Respectfully Submitted,

/s/Sherry Hartel Haus

Jeffrey B. Rudman (BBO #433380) James W. Prendergast (BBO #553073) Sherry Hartel Haus (BBO #663777) Melissa B. Coffey (BBO #660750) Wilmer Cutler Pickering Hale and Dorr LLP 60 State Street Boston, MA 02109 (617) 526-6000

Dated: September 5, 2007 Attorneys for Sonus Networks, Inc.

DEFENDANT SONUS NETWORKS, INC'S RULE 26(c) AND LOCAL RULES 7.1(A) AND 37.1(B) CERTIFICATION

Pursuant to Federal Rule of Civil Procedure 26(c), and Local Rules 7.1(A)(2) and 37.1(B), counsel for defendants Sonus Networks, Inc. hereby certifies that by e-mails dated August 28, 29, and 30, 2007 and teleconference on September 4, 2007, she conferred in good faith with opposing counsel regarding Defendant Sonus Networks, Inc.'s Motion for Protective Order to Preclude Discovery on Dismissed and Unpleaded Claims and Allegations and to Limit Discovery to a Reasonable Time Period, and was unable to resolve the matters at issue in this motion.

Respectfully Submitted,

/s/Sherry Hartel Haus

Jeffrey B. Rudman (BBO #433380) James W. Prendergast (BBO #553073) Sherry Hartel Haus (BBO #663777) Melissa B. Coffey (BBO #660750) Wilmer Cutler Pickering Hale and Dorr LLP 60 State Street Boston, MA 02109 (617) 526-6000 Attorneys for Sonus Networks, Inc.

Dated: September 5, 2007

CERTIFICATE OF SERVICE

I, Sherry Hartel Haus, hereby certify that on September 5, 2007, I caused a true copy of
the foregoing document to be served electronically via the Court's Electronic Filing System upon
all counsel of record.

/s/Sherry Hartel Haus Sherry Hartel Haus